

# Vinson&Elkins

Marisa F. Antonelli mantonelli@velaw.com  
**Tel** +1.212.237.0151 **Fax** +1.917.849.5396

July 29, 2025

**Via CM/ECF**

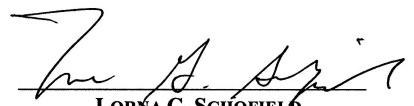
Hon. Lorna G. Schofield  
 United States District Court  
 Southern District of New York  
 500 Pearl Street  
 New York, New York 10007

Application **GRANTED**. Defendant shall answer or otherwise respond to the Complaint by **September 2, 2025**. The initial pretrial conference scheduled for August 12, 2025, is **ADJOURNED to September 16, 2025, at 3:15 P.M.** The parties shall file their pre-conference materials by **September 9, 2025**.

By **August 7, 2025**, Plaintiff shall file a letter stating whether it intends to request leave to file an amended complaint.

The Clerk of Court is respectfully directed to close the motion at Dkt. No. 22.

Dated: July 30, 2025  
 New York, New York



LORNA G. SCHOFIELD  
 UNITED STATES DISTRICT JUDGE

**Re: Mazzaccone, et al. v. Bolivarian Republic of Venezuela, 1:24-cv-09114-LGS: Joint Request for Extension of Time and Adjournment of Initial Pretrial Conference**

Dear Judge Schofield:

Pursuant to Rule I.B.3 of Your Honor's Individual Rules and Procedures for Civil Cases, the parties jointly submit this letter motion to respectfully request:

1. A one-month extension of Defendant's deadline to respond to the complaint, currently due on July 31, 2025, to September 2, 2025; and
2. A one-month adjournment of the initial pretrial conference, currently scheduled for August 12, 2025, to a date convenient to the Court on or after September 12, 2025.

On July 18, 2025, immediately after retaining counsel in this matter, Defendant sought, and this Court granted, an extension of time to respond to the complaint to July 31, 2025. Following this extension, the parties have conferred regarding certain alleged pleading deficiencies, and Plaintiff is considering amending the complaint on consent pursuant to Fed. R. Civ. P. 15(a)(2). Defendant submits that granting this further extension could result in the avoidance of unnecessary motion practice.

In addition, although Plaintiff made, and this Court granted, three prior requests to adjourn the initial pretrial conference while working to complete service on Defendant, this is the parties' first request to adjourn the initial pretrial conference since Defendant retained counsel.

This request will affect the Court's Order (Dkt. No. 13), which requires the parties to submit their pre-conference materials by August 5, 2025. To align with any new initial pretrial conference date the Court may set, the parties respectfully propose that the deadline for submission of pre-conference materials be set for one week prior to the new conference date, should the Court grant the requested adjournment.

V&E

July 29, 2025 Page 2

Respectfully submitted,

/s/ Rudolph J. Di Massa, Jr.

Rudolph J. Di Massa, Jr.  
DUANE MORRIS, LLP  
22 Vanderbilt  
335 Madison Avenue  
23<sup>rd</sup> Floor  
New York, New York 10017  
Telephone: (215) 979-1506  
dimassa@duanemorris.com

*Counsel for Plaintiff*

/s/ Marisa F. Antonelli

Marisa F. Antonelli  
Camilo Cardozo  
Dora Georgescu  
VINSON & ELKINS LLP  
The Grace Building  
1114 Avenue of the Americas  
32<sup>nd</sup> Floor  
New York, New York 10036  
Telephone: (212) 237-0000  
mantonelli@velaw.com  
ccardozo@velaw.com  
dgeorgescu@velaw.com

*Counsel for Defendant The Bolivarian  
Republic of Venezuela*